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August 15, 2013

Hon. Michael A. Hammer, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: White v. Smiths Group, plc, et al.
Civil Action No. 2:10-4078 (KM/MAH)

Dear Judge Hammer:

Your Honor's Order of July 22, 2013 (ECF No. 163) instructed the parties to continue discussions pertaining to two discovery disputes. We were initially to report to Your Honor in a joint letter on Monday, August 5, 2013 our attempts at resolution and the respective party's reasoning why the response is or is not deficient. Together, we asked and Your Honor consented to our filing the joint letter on Monday, August 19, 2013.

Since our last communication, the parties continued to confer. We agreed to gather and exchange information with a view to resolving or narrowing the disputes. We have, however, encountered delays because of vacation schedules. The parties have agreed to ask Your Honor for an additional 14 days to gather facts and continue our discussions. We respectfully request leave to report the results of our efforts to the court on Tuesday, September 3, 2013 in the joint letter described in your Honor's July 2, 2014 Order.

Thank you, Your Honor, for your consideration.

Very truly yours,
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

By: s/ Ellen O'Connell
Ellen O'Connell

cc: John Lee, Esq. (via email)
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Melvyn Bergstein, Esq. (via email)